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June 23, 2021

**VIA ECF**

Hon. Marian W. Payson  
United States Magistrate Judge  
100 State Street  
Rochester, New York 14614

**Re: Bail Modification Request for Mark Anthony Phillips  
*USA v. Phillips*, 21 MJ 4062 (MWP)**

Dear Judge Payson:

On May 24, 2021 I made a bail modification request on behalf of Mr. Mark Anthony Phillips for his pre-planned vacation with his wife and child to the Outer Banks in North Carolina from June 27 to July 11, 2021, planned before his arrest on May 5, 2021. At the time, I did not know that the trip included a portion of travel to the Middle District of Florida, specifically the Tampa area. I respectfully request that the bail modification be further modified to include his travel, from July 3-8, to the Middle District of Florida.

Mr. Phillips did not realize that he had to identify every place he was going as part of his vacation. When he recently filled out his itinerary for Pretrial Services, the addition was noted by Pretrial and he was informed that he needed specific permission to travel to the Tampa area. During the time period from July 3-8 he will be staying with a friend by the name of Brett Coover at 806 N. Florida Avenue, Tarpon Springs, FL 34689. When I did the initial request for modification, I did not ask him for more specific information, for which I apologize to the Court.

I have spoken to Assistant United States Attorney Richard Resnick and to Mr. Phillips' Pretrial Services Officer, Jennifer Cannito, about this application. Neither Mr. Resnick nor Ms. Cannito has an objection to the bail modifications herein requested.

Sincerely,

*s/s Camille M. Abate, Esq.*

cc: AUSA Richard Resnick (via ECF)  
PTSO Jennifer Cannito (via ECF)